

REMARKS

This application is a Continuation of U.S. Patent Application Serial No. 09/514,963, filed February 29, 2000, the specification of which is incorporated by reference, which was a continuation-in-part of copending U.S. Application Serial No. 09/399,613 filed Sep. 20, 1999.

Claims 1, 6, and 11 have been amended, and no claims have been canceled or added; as such, claims 1-12 are presently pending in the case.

During prosecution of the parent application, an office action dated June 27, 2003 (the "office action"), rejected original independent claims 1, 4-6, and 9-12 as being anticipated by Smutek et al. (U.S. Patent No. 5,526,445). The Examiner further added that Spaulding et al. (U.S. Patent No. 5,822,451) and Lin (U.S. Patent No. 5,966,507), while not relied upon for the office action, were considered pertinent to the Applicant's disclosure.

The Examiner also rejected claims 11 and 12 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In addition, the Examiner objected to original claims 2, 3, 7, and 8 indicating that they contained subject matter that would be allowable if combined with the elements and limitations of their respective base independent claims and any intervening claims.

In the interest of furthering the prosecution of the parent case, the Applicant placed the objected to subject matter into condition for immediate allowance and canceled those claims which stood rejected in the office action. The present preliminary amendment addresses additional allowable subject matter as supported by the specification of the parent case as originally filed.

In the office action of the parent case, the Examiner stated that Smutek discloses the use of a scaled set of matrix values to generate a scaled set of destination sub-pixels, each of the destination pixels being dependant on a halftone relationship between the source pixel and the corresponding matrix value. The Examiner further indicated that this process is carried out for each of the source pixels in order to produce a desired repeating pattern representing the tonal value of the source pixel.

Smutek appears to describe a method of growing a halftone spot using pixel threshold values for a plurality of pixels to prevent the creation of Moire patterns. (See Smutek, column 3, lines 60-67). Smutek does not appear to

describe a method of halftoning utilizing a scaled set of matrix values defined by the resolution of the destination image.

In the office action, the Examiner stated that Spaulding and Lin disclosed examples of scaled threshold matrices. Spaulding appears to describe a halftoning method using dithering matrices and look up tables to scale the magnitude of input values so that they are compatible with the magnitude of values stored in an optimized multi-toning dither matrix. (See Spaulding, column 13, lines 62-66). Lin appears to describe a method of multi-level halftoning which produces a gray scale impression with dots at different intensity levels. (See Lin, column 3, lines 6-10). Neither Spaulding nor Lin appears to describe halftoning through creation of a scaled set of matrix values defined by the resolution of the destination image.

In contrast, by way of example and not by way of limitation, the Applicant's independent claims 1 and 6, as amended, describe a method of defining halftone patterns with respect to a specific source image by creating a scaled set of matrix values defined by the resolution of the destination image. In addition, Applicant's claim 11, as amended, describes one or more output sub-tones defined by the resolution of the destination image. Support for this claim language used to amended Applicant's original claims 1, 6, and 11 is found in the Applicant's specification, which recites, "It is an important element of this invention that halftone patterns be defined with respect to a specific source image sampling grid that is defined by the resolution of the destination image." (See Spec. page 11, lines 11-14).

Accordingly, Smutek does not contain each and every element and limitation of Applicant's independent claims 1, 6, and 11, as amended. Additionally, the Spaulding and Lin references do not cure the deficiencies of the Smutek reference. The Applicant has also amended claim 11 to provide proper antecedent basis. As such, the Applicant believes that independent claims 1, 6, and 11, as well as those which depend therefrom, are in condition for allowance. Applicant respectfully requests consideration of the same upon review of the present preliminary amendment.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (541) 715-7331.

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